

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**BROAD-BUSSEL FAMILY LIMITED  
PARTNERSHIP and CAROLINE B. GLASS,  
Individually and on Behalf of All Other  
Persons and Entities Similarly Situated,**

: CIVIL ACTION NO. 07-CV-2026

**Plaintiffs,**

: CLASS ACTION

**HENNESSEE GROUP LLC,  
ELIZABETH LEE HENNESSEE, and  
CHARLES J. GRADANTE,**

: JURY TRIAL DEMANDED

**Defendants.**

:

**PLAINTIFFS' MOTION TO CONSOLIDATE**

Plaintiffs Broad-Bussel Family Limited Partnership (“Broad-Bussel”) and Caroline B. Glass (“Glass”) (collectively, the “Plaintiffs”), individually and on behalf of all other persons and entities similarly situated (the “Class”), respectfully move under Fed. R. Civ. P. 42(a) and Southern District of New York Local Rule 15(a) to consolidate this action with a related case pending in this Court, Broad-Bussel Family Limited Partnership, et al. v. Bayou Group LLC, et al., 06 CV 3026 (CM) (S.D.N.Y.) (McMahon, J.) (“*Broad-Bussel I*”). *Broad-Bussel I* is pending before this Court as part of the multidistrict proceedings In Re Bayou Hedge Fund Investment Litigation, 06 MDL 1755 (CM) (S.D.N.Y.) (McMahon, J.).

In support of their Motion to Consolidate, Plaintiffs submit their accompanying Memorandum of Law, the complaint in this action, and the amended complaint filed and pending in *Broad-Bussel I*.

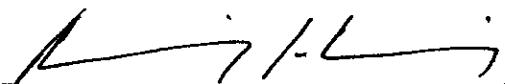
Dated: March 1, 2007  
New York, NY

Respectfully Submitted,

Of Counsel:

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Attorneys for Plaintiffs and the Class

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CERTIFICATE OF SERVICE

I certify that I caused a copy of Plaintiffs' Motion to Consolidate and Memorandum of Law in Support thereof to be served on counsel for defendants Hennessee Group LLC, Elizabeth Lee Hennessee, and Charles J. Gradante in the manner indicated below:

Via First-Class Mail

Lawrence E. Fenster, Esq.  
Matthew C. Plant, Esq.  
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Dated: March 2, 2007

  
Lane L. Vines